

ALA American Library Association

April 19, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Modernizing the E-rate Program for Schools and Libraries (WC Docket No. 13-184;
CC Docket No. 02-6). Release of E-Rate Category 2 Funding Report

Dear Ms. Dortch:

The American Library Association (ALA) appreciates the Category 2 (C2) Report¹ released by the Commission on February 11, 2019. We think the report provides a comprehensive review of the successful changes made to C2 (previously Priority 2) as part of the 2014 E-rate Modernization process. These changes—along with the increase in program funding—have ensured that all applicants are now able to receive C2 funding. While ALA strongly supports these changes to C2, unless the Commission takes action the current rules will expire after the 2019 E-rate funding year and the previous “2 in 5” rules will again become effective. To prevent this, we agree with comments filed by the State E-rate Coordinators Alliance (SECA) and the Schools, Health and Libraries Broadband coalition (SHLB) that the Commission issue a Notice of Proposed Rulemaking (NPRM) on the C2 rules as soon as possible.

One area of concern the C2 Funding Report highlights is the lower participation rate for rural libraries compared to urban libraries (see paragraphs 12, 29, 31, 32-46). We generally agree with the factors the Commission has listed in paragraph 12 as likely accounting for this difference.² To address this, we suggest the Commission consider the Report’s recommendation (paragraph 46) to increase the funding floor and explore other ways to decrease the administrative burdens on both smaller libraries and schools. The ALA is ready to work with the Commission to seek solutions to the issues that smaller libraries confront when applying for C2 funding.

¹ *Report, Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184 (Feb. 11, 2019) (Category 2 Funding Report).

² These factors include the \$9,200 funding floor, administrative burdens, lack of funds for the non-discounted share, and the need to comply with the Children’s Internet Protection Act (CIPA).

While agreeing with the report's recommendation to continue the current C2 rules, we also want to call attention to the other C2 changes ALA proposed in our filing³ in response to the Commission's Public Notice released September 22, 2017.⁴ We hope any C2 NPRM will incorporate the recommendations made by ALA and seek comments on these recommendations. (We note that other organizations also filed comments in response to the September 2017 notice.)

In conclusion, we support the findings in the Commission's C2 Funding Report that the rule changes in C2 have been successful and should continue. In addition, we encourage the Commission to release an NPRM seeking comment on the future of C2 funding to ensure the changes made as part of the Modernization process continue past 2019.

Please let us know if you have any questions.

Respectfully submitted,

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³ Comments of the American Library Association on the FCC Notice on the Sufficiency of Budgets for Category Two Services. Filed October 23, 2017 (https://ecfsapi.fcc.gov/file/102330495230/ALA_E-rate_Comments_10_23_2017.pdf). Specifically, we call attention to the section titled "Recommendations for changes to category two" on p. 4-6 in our filing.

⁴ Wireline Competition Bureau Seeks Comment on the Sufficiency of Budgets for Category Two Services. (DA 17-921. Released September 22, 2017 (https://ecfsapi.fcc.gov/file/0922880228985/DA-17-921A1_Rcd.pdf)).